

EXHIBIT 15

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

AMERICAN CIVIL LIBERTIES UNION,)
et al.,)

Plaintiffs,)

v.)

ALBERTO R. GONZALES, in his official)
capacity as Attorney General of the United)
States,)

Defendant.)

Civil Action No.
98-CV-5591

**NERVE'S RESPONSES AND OBJECTIONS TO DEFENDANT'S FIRST SET OF
INTERROGATORIES**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Nerve.com, Inc. ("Plaintiff") responds and objects to Defendant Alberto R. Gonzales's First Set of Interrogatories ("Interrogatories") as follows:

GENERAL OBJECTIONS

1. Plaintiff objects to the Interrogatories to the extent the instructions and demands therein purport to impose obligations in addition to, beyond, or different from those set forth in the Federal Rules of Civil Procedure and the Rules of Civil Procedure of the United States District Court for the Eastern District of Pennsylvania.
2. Plaintiff objects to the Interrogatories to the extent they call for the identification or disclosure of information that is neither relevant to the claims and defenses of any party in this action nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff submits these responses and objections without conceding the relevance or materiality of the subject matter of any interrogatory.

RESPONSE TO INTERROGATORY NO. 12

Plaintiff objects to this Interrogatory because it calls for identification of information not within the possession, custody or control of the Plaintiff. Subject to the foregoing and to the General Objections, Plaintiff states that it has no information responsive to this request.

INTERROGATORY NO. 13

For each website plaintiff, identify a representative sample of webpages on your website which contains material about which you fear prosecution under COPA, as referenced in Paragraph 2 in the section titled "The Impact of COPA on Plaintiffs" on page 24 of the Amended Complaint that "[P]laintiffs fear prosecution under COPA for communicating, sending, displaying, or distributing material that might be deemed 'harmful to minors' by some community in the United States."

RESPONSE TO INTERROGATORY NO. 13

Plaintiff objects that this Interrogatory is premature, unreasonably cumulative and duplicative of Document Requests No. 1 and No. 13, and calls for identification of information that is in the public domain. Plaintiff also objects that the phrases used to define "representative sample," including "distribution of characteristics," "degree of explicitness of sexual content," and "population or universe" are vague and ambiguous. Subject to the foregoing and to the General Objections, Plaintiff refers to the web content identified in the Amended Complaint and responds as follows: Plaintiff is an online magazine dedicated to a frank exploration of sex and sexuality. Plaintiffs' lauded website contains a wide variety of subsections with sexual content. For example:

1) In the "Fiction" section (<http://www.nerve.com/fiction/>, last viewed October 23, 2005) visitors may read excerpts of sexual content from books that are nominated for the

magazine's monthly "Henry Miller Award." The October entries for the award include descriptions of sexual acts outside the home from "How We Are Hungry" by David Eggers, anal sex between two women from "An Exploration" by Dorothy Allison, and sex at gun point from "San Francisco Noir" by David H. Sterry;

2) In the "Photography" section (<http://www.nerve.com/photography/>, last viewed October 24, 2005) Members can take a free tour to peruse sexually explicit photographs, including people engaged in sexual acts, photographs exploring the interaction between power and sex, and amateur submissions to photo contests;

3) In the "Blog-A-Log" section (<http://www.nerve.com/multipageapp/bloglogsplash.aspx?multipageid=2>, last viewed October 24, 2005), visitors can read about the dating experiences of six Nerve contributors in personal online postings or "blogs." These postings contain frank discussions about attraction, dating and sex;

4) <http://www.nerve.com/blogs/> (last viewed October 27, 2005) and the links accessible therein contain or may contain in the future, among other things, candid and explicit comments or questions on a diverse category of topics posted directly by internet web users.

INTERROGATORY NO. 14

For each website plaintiff, identify a representative sample of webpages on your website which you believe contains material that has serious literary, artistic, political, scientific and/or social value for adults.

RESPONSE TO INTERROGATORY NO. 14

Plaintiff objects to the extent this Interrogatory calls for the identification of information that is neither relevant to the claims and defenses of any party in this action nor



the nerve amateur photo contest

This Month: Sexiest photo of someone enjoying pasta



nerve

Home | Personal | Photography | Features | Archives | News | Video | Interactive | About | Contact

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You have reached a Nerve Premium offering



The Courting of Anatomy

by Helen Walsh

Jamie and Sean pretty much shaped my understanding of sex. He's a funny one, Jamie — he's had his fair share of one night stands, but he seemed to accept them with a silent sorrow. He subscribed to an ideal which held love as a precondition for sex and he once told me that even if that love was ephemeral, even if it lasted all of five seconds, it had to be there in the beginning. If there was love, any sexual pursuit, no matter how selfish or dangerous it was, could be justified. As a result, he misspent a lot of his youth trying to negotiate between what felt good and what he thought was right. Sean was the polar opposite. He saw sex in its crudest terms — as something detached from any kind of emotion or meaning other than the physical. For him, sex was fucking — it was getting one's hole and getting as much of it as possible. He was ruthless, almost barbaric, in his pursuit of women, especially those lacking in sexual experience. He slept his way through South Liverpool, leaving in his wake a bereft trail of ruptured hearts and hymens.

From Jamie I learned that sex was as much concerned with psychology as it was with physiology. It was as much about the courting of anatomy as it was the meeting of two hearts, two minds. I also learned that it was better to have done something and have regretted it, than to have not done it and spend your days wishing you had. Jamie spent a lot of his days reading books about things he wished he'd done.

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Nerve Premium is your all-access pass to Nerve, the premiere online magazine about sex and culture. Sign up now for a \$35 annual subscription and pick your choice of 3 magazines.*



You'll also get:



Hotter Photography. Photography so good, you could hang it in an art gallery — but so sexy, you'll be glad you can see it at home! An exclusive Premium-Members-Only gallery every week, featuring our hottest photos of naked women, men and couples.



Unlimited Browsing. Only Premium members can see the Nerve Archives. That's more than 2,000 personal essays, interviews, columns, and fiction by today's best writers. And, of course, more than 5,000 photos!



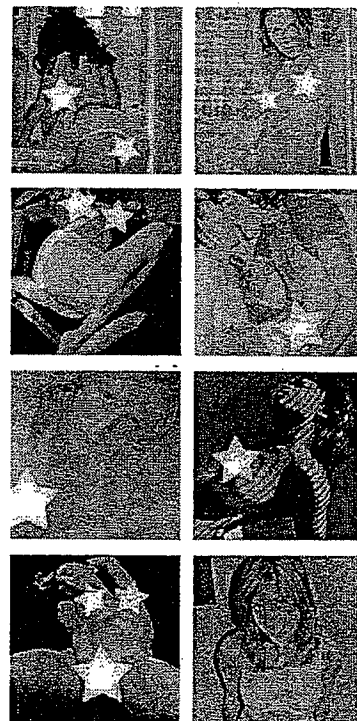
Interactive Nerve. Featuring uncensored videos, the monthly Amateur Photo Contest, the addictive on-screen crossword puzzle, and The Daily Siege weblog!



A smart sex magazine for men and women. Thanks to your support, Nerve can continue to be the ground-breaking, award-winning website you know and love. Support the cultural revolution!

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DEFENDANT'S
EXHIBIT

For ID: 2/21/06
R. Poppo



meet
Camilla



NERVE

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Mystery Tour

by Luke Sutherland

Some friends of mine set up a pirate radio station in the summer of 2002 and broadcast for six weeks. They also set up a related internet chat site, inviting listeners to log on to air their very worst and best. The results were often explosive with chatters indulging in anything from insane no-holds-barred tirades, to sexual role-play. The following is a transcription of one of the chat-room scripts: a role play instigated by a character who called herself (or himself) The Most Beautiful Girl You Losers Have Ever Seen, in which she's chauffeur driven around London by James Dean, accompanied by guests, Chubby Bunny Boy, Joan Of Arc, and Barbarella.

Please login to continue

member
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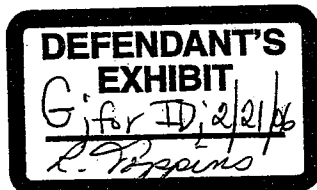
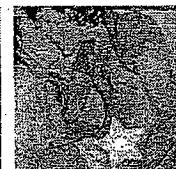
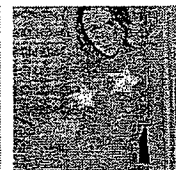
Unlimited Browsing. Only Premium members can see the Nerve Archives. That's more than 2,000 personal essays, interviews, columns, and fiction by today's best writers. And, of course, more than 5,000 photos!



Interactive Nerve. Featuring uncensored videos, the monthly Amateur Photo Contest, the addictive on-screen crossword puzzle, and The Daily Siege weblog!



A smart sex magazine for men and women. Thanks to your support, Nerve can continue to be the ground-breaking, award-winning website you know and love. Support the cultural revolution!





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You have reached a FREE Nerve feature

Login or JOIN NOW. It's free and only takes 30 seconds. Once you join, you can instantly post a profile on Nerve Personals and check out all new Nerve articles.

Having trouble logging in to Nerve Personals? [Click here for help.](#)

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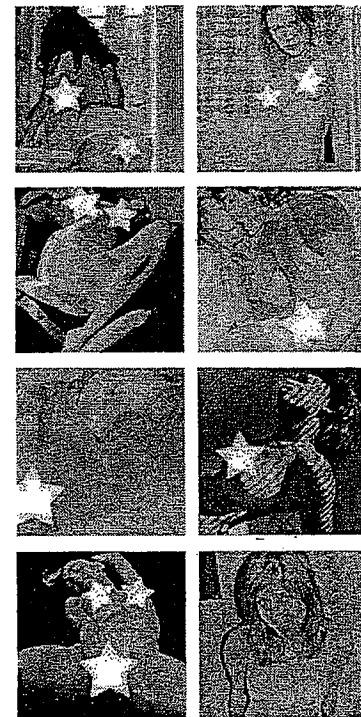
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**DEFENDANT'S
EXHIBIT**

Ej for Id: 2/21/06
R. Pappas



Free Tour

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Seeing Stars? [Get Premium](#) and Clear Your Vision



We created Nerve because we think sex is beautiful and absurd, remarkably fun and reliably trauma-inducing. We believe that women and men deserve a smart, honest magazine on sex, with provocative prose and fiction, edgy cultural coverage, and striking photographs of naked people that capture more than their flesh.

So why Nerve premium?... [next>>](#)

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Choose a
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*Passwords must be a minimum of 6, and a maximum of 20 characters in length.

Name*: first last

*Your real name will never be revealed to other users. Click [here](#) to read our Privacy Vow

Email address:

Special Offer!

Pick 3!

Subscribe to Nerve Premium NOW!

More Info:

Rolling Stone	EHM
New Republic	Wired
Men's Journal	Esquire

Gender: Please select...

City:

State/Province: Please select...

(US and Canada
only)

Country: Please select...

Zip/Postal Code:

Date of Birth:

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*You must be at least eighteen to join. Your entry will also determine your age in your personal ad and cannot be changed.

Would you like to receive NerveNews, a weekly email highlighting the best of Nerve.com?*

☒ yes please!

☐ no thanks.

*PLEASE NOTE: If you opt in to receive Nerve mailings – and we hope you do! – please make sure that your email program is set to accept mail from the domain "nervemessages.com."

Would you like to receive occasional email updates from Nerve partners and friends?

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By completing this registration process and clicking the "join" button below, you agree to abide by these Terms of Service.

Please Note: Nerve Premium and Nerve Personals are separate offerings. Nerve Premium subscriptions do not provide access to paid content on Nerve Personals.

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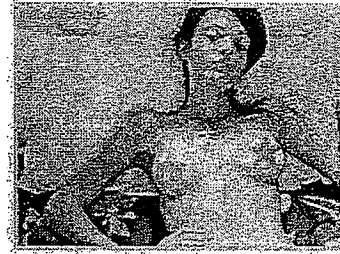
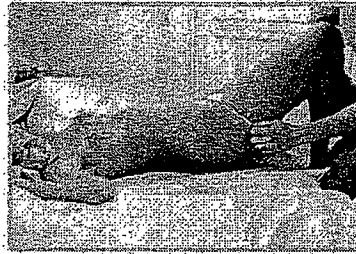
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Seeing Stars? [Get Premium](#) and Clear Your Vision



Nerve Premium is the Nerve you love, but –
Uncensored.

Unfiltered.

Amplified.

In other words, Nervier.

We'll show you what we mean... [next>>](#)

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Rolling Stone
Rolling Stone
Rolling Stone

Britney
Britney
Britney

Hot
Hot
Hot

More Info:
Rolling Stone
New Republic
Men's Journal
Entertainment Weekly
Vibe
Wired
Esquire

Gender: Please select...

City:

State/Province: Please select...

(US and Canada
only)

Country: Please select...

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Premium Photography

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Premium subscribers get access to Premium Photography Galleries.

As a Premium subscriber you get our sexiest galleries by today's best photographers, who aren't afraid to push their own boundaries – or yours. Nerve Premium is where artists display work they won't, or can't, show anywhere else.

With a new Premium gallery every week and more than 5,000 photos in our gallery collection, Nerve Premium is the complete package – hot, quality photography that won't leave you wanting.

And there's more... [next>>](#)

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Pick 3!

Subscribe to Nerve Premium NOW

More Info:

Rolling Stone	Entertainment Weekly
New Republic	Wired
Men's Journal	Esquire

Gender: Please select...

City:

State/Province: Please select...

(US and Canada
only)

Country: Please select...

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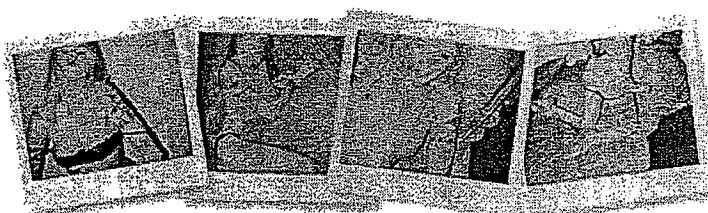
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Daily Siege Blog

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Live vicariously through **The Daily Siege**, the hottest & most original weblog we've seen. Every day, our star photographer **Siege** chronicles his life in photos...

His private life...

His public life...

And, of course, his sex life.

Or if you're looking for something more hands-on... [next>>](#)

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